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Attorneys for Albertsons Companies, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

Case No. 3:24-cv-00347-AN

FEDERAL TRADE COMMISSION, et al.
Plaintiffs,

v.

THE KROGER COMPANY and
ALBERTSONS COMPANIES, INC.

Defendants.

**DEFENDANT’S UNOPPOSED
MOTION FOR ENTRY OF A
STIPULATED PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c)

MOTION

Pursuant to Fed. R. Civ. P. 26(c), Defendant Albertsons Companies, Inc. moves for entry of a Stipulated Protective Order in the form submitted herewith. Defendant The Kroger Company and Plaintiffs have signed the proposed Stipulated Protective Order and do not oppose this motion.

MEMORANDUM

One or more of the parties has requested the production of documents or information that at least one party considers to be or to contain confidential information, and that are subject to protection under Federal Rule of Civil Procedure 26(c).

The parties agree that good cause exists to protect the confidential nature of the information contained in documents, interrogatory responses, responses to requests for admission, or deposition testimony. The parties expect to exchange documents and information relating to confidential information, or sensitive or personal commercial information. The parties agree that the entry of the proposed Stipulated Protective Order is warranted to protect against disclosure of such documents and information.

DATED this 26th day of April, 2024.

Respectfully submitted,

ANGELI LAW GROUP LLC

/s Peter D. Hawkes

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